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*Attorneys for Defendants Cipla Limited and Cipla USA, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

TEVA BRANDED PHARMACEUTICAL  
PRODUCTS R&D, INC. and  
NORTON (WATERFORD) LTD.,

Plaintiffs,

v.

CIPLA LIMITED and CIPLA USA, INC.,

Defendants.

Civil Action No. 24-909 (SRC)(MAH)  
(consolidated)

Civil Action No. 24-5856 (SRC)(MAH)

Civil Action No. 24-7162 (SRC)(MAH)

Hon. Stanley R. Chesler, U.S.D.J.

Hon. Michael A. Hammer, U.S.M.J.

**DECLARATION OF  
RACHEL A. GITOMER, ESQ.,  
IN SUPPORT OF APPLICATION FOR  
ADMISSION *PRO HAC VICE***

Document Filed Electronically

**RACHEL A. GITOMER, ESQ.**, of full age, hereby declares as follows:

1. I am an attorney-at-law with the law firm of K&L Gates LLP, 609 Main St.,

Suite 4150, Houston, Texas 77002. I am not under suspension or disbarment in any jurisdiction or court. No disciplinary proceedings are pending against me, and no discipline has previously been imposed upon me in any jurisdiction or court.

2. I submit this Declaration in support of the application by Defendants Cipla Limited and Cipla USA, Inc. (“Cipla”) to permit me to appear and participate, *pro hac vice*, as counsel for Cipla at pre-trial, trial, and post-trial proceedings of the above-captioned action.

3. I am duly admitted and currently in good standing to practice law in the following jurisdiction, for which I list my year of admission and the address of the official office maintaining the roll of such members of its bar:

Court	Address
State Bar of Texas (2023)	The State Bar of Texas Membership Department 1414 Colorado Street Austin, Texas 78701

4. I practice in the litigation of patent matters, and am familiar with this action.

5. I am associated in this matter with Loly G. Tor, a partner with K&L Gates LLP, who is the attorney of record for Cipla, is authorized to practice law in New Jersey, and is a member in good standing of the bar of this Court.

6. Upon being admitted to appear and participate in this matter *pro hac vice*, I shall promptly make payment to the New Jersey Lawyers’ Fund for Client Protection as provided by New Jersey Rule 1:28-2(a), for any year in which I continue to appear in this matter.

7. Upon being admitted to appear and participate in this matter *pro hac vice*, I shall also promptly make payment to the Clerk of the United States District Court for the District of New Jersey as provided by Local Civil Rule 101.1(c)(3).

8. I also understand that upon admission *pro hac vice*, I am subject to the orders

and amenable to disciplinary action and the civil jurisdiction of this Court and the New Jersey State Bar in all respects as if I were regularly admitted and a licensed member of the Bar of the State of New Jersey in good standing. I agree to notify the Court immediately of any matter affecting my standing at the bar of any other court.

9. Upon being admitted to appear and participate in this matter, *pro hac vice*, I shall abide by Local Civil Rule 101.1(c).

10. For the foregoing reasons, it is respectfully requested that the Court grant Cipla's application to have me admitted *pro hac vice* to appear and participate as counsel in this matter pursuant to Local Civil Rule 101.1(c).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 26, 2024.

  
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Rachel A. Gitomer, Esq.